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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ISNEY ECHAVARRIA-PEREZ, individually,

Plaintiff,

v.

MICHAEL SOMMERS, individually;
ASSURED AUDIT PEST PREVENTION, LLC,
an Arizona limited liability company;
ASSURED AUDIT PEST PREVENTION
CORPORATION, a California corporation;
DOE DRIVER, individually; MAXWAY
FREIGHT, LLC, a Utah Limited Liability
Company; MAXWAY, INC., a Utah
Corporation; DOES I through X, and ROE
BUSINESS ENTITIES, XI through XX,
inclusive,

Defendants.

CASE NO. 2:25-CV-00063-EJY

**STIPULATION TO CONTINUE
DEADLINE TO FILE MOTIONS TO
AMEND**

(FIRST REQUEST)

~~[PROPOSED]~~ **NEW DEADLINE: May 12,
2025**

COME NOW the parties, by and through their respective counsel of record, and hereby stipulate to extend the time to file Motions to Amend the Pleadings, with a current deadline of April 10, 2025, by 32 days, to May 12, 2025. This is the first stipulation for extension of time, being made before the current deadline of April 10, 2025. The parties are currently in the process of responding to written discovery requests which will identify 'DOE DRIVER,' who has not yet been identified by the Plaintiff in this matter. Accordingly, the parties have agreed to a brief

extension of time to allow Plaintiff to obtain the identity of 'DOE DRIVER,' at which time the Complaint will be amended to identify the individual driver by name.

DATED March 19, 2025

GINA CORENA & ASSOCIATES

/s/ Mark Rouse

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Attorneys for Plaintiff

DATED March 19, 2025

ROGERS, MASTRANGELO, CARVALHO &
MITCHELL

/s/ Stephen Rogers

Stephen H. Rogers

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*Attorneys for Defendants, Sommers and
Assured Audit Prest Prevention*

DATED March 19, 2025

WINNER & BOOZE

/s/ Christine Booze

Christine Booze, Esq.

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Attorneys for Defendant, Maxway, Inc.

DATED March 19, 2025

RESNICK & LOUIS, P.C.

/s/ Paul Acker

Paul Acker, Esq.

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Attorneys for Defendant, Maxway, Inc.

IT IS SO ORDERED.

Dated: March 19, 2025



UNITED STATES MAGISTRATE JUDGE